

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. CR 19-3105-MV

TRISTIAN CADMAN,

Defendant,

**UNOPPOSED MOTION TO SUBMIT DEFENSE SENTENCING
MEMORANDUM AND RESPONSE TO GOVERNMENT'S
SENTENCING MEMORANDUM UNDER SEAL**

COMES NOW Defendant Tristian Cadman, through his attorney, Jeffrey J. Buckels, and moves this Court for an order permitting counsel to file a sentencing memorandum and response to the Government's sentencing memorandum under seal.

The Government, per AUSA Joseph Spindle, does not oppose this motion.

U.S. Probation filed the Presentence Report herein on January 28. [Doc. 35]. The Government filed its Sentencing Memorandum on February 11. [Doc. 37]. Hence, the defense sentencing memo and response to the Government's are both due to be filed on or before February 18. The defense sentencing memo will include as an attachment a forensic evaluation of Mr. Cadman completed by Dr. Simone Viljoen PhD. This is a medical record. Moreover, counsel will make

reference to details and conclusions of this evaluation in the body of the defense memo. These confidential matters should only be available to the necessary parties, to wit, the Government, U.S. Probation, and this Court.

WHEREFORE, the defense requests relief as set forth hereinbefore.

Respectfully Submitted,

Electronically filed 2/11/21

/s/ Jeffrey J. Buckels
Jeffrey J. Buckels
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was electronically submitted on this 11th day of February, 2021, and thus served on opposing counsel, to wit:

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/s/ Jeffrey J. Buckels
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